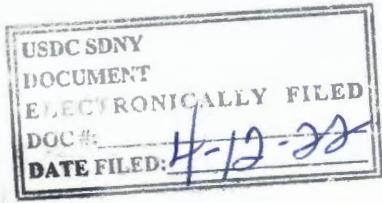


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April 7, 2022

Via ECF

The Honorable Lewis A. Kaplan,
United States District Court for the Southern District of New York,
500 Pearl Street,
New York, NY 10007.

Re: Cervecería Modelo de México, S. de R.L. de C.V. v. CB Brand Strategies, LLC, et al., No. 1:21-CV-07316-LAK (S.D.N.Y.)

Your Honor:

I write on behalf of Plaintiff Cervecería Modelo de México, S. de R.L. de C.V. (“Modelo”), pursuant to Federal Rule of Civil Procedure 5.2(d) and Your Honor’s Individual Rules of Practice to request leave to file under seal certain portions of Modelo’s proposed First Amended Complaint (the “Amended Complaint”) and the related redline to Modelo’s original complaint, both of which accompany Modelo’s letter motion for leave to file its proposed First Amended Complaint.

The Amended Complaint contains references to a confidential settlement agreement between Defendants and the Consejo Regulador del Tequila, A.C. (“CRT”). Defendants initially provided this agreement (the “CRT Agreement”) to Modelo on an Outside Attorneys’ Eyes Only basis, citing the confidentiality provision in the CRT Agreement. The CRT has now granted permission to disclose the CRT Agreement to Modelo’s in-house counsel, but the CRT required Modelo to sign an agreement not to disclose any terms of the CRT Agreement to other persons absent written permission.

For the foregoing reasons, Modelo respectfully requests that its motion for leave to file the Amended Complaint and related redline under seal be granted. Following Your Honor’s Individual Rules of Practice, Modelo will file the Amended Complaint and related redline in redacted form until the Court rules on this motion.

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The Honorable Lewis A. Kaplan

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Respectfully,

/s/ *Michael H. Steinberg*

Michael H. Steinberg

(Enclosures)

cc: *All counsel* (via ECF)

Granted
SO ORDERED
Lewis A. Kaplan
LEWIS A. KAPLAN, USDJ
4/12/22